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June 29, 2010

VIA ECF

Honorable James S. Gwin
United States District Court
Carl B. Stokes United States Court House
801 West Superior Avenue
Cleveland, Ohio 44113-1838

Re: *Melinda Serin, et al. v. Northern Leasing Systems, Inc., et al.*
Docket No. 06 CV 1625 (JG)

Your Honor:

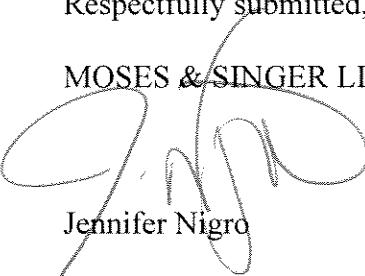
This firm represents defendants Northern Leasing Systems, Inc. (“NLS”), Jay Cohen, Rich Hahn and Sara Krieger (the “Individual Defendants”; together with NLS, “Defendants”) in the referenced matter. Further to our letter dated June 17, 2010 and in response to Plaintiffs’ letter dated June 21, 2010, Defendants respectfully advise the Court of the following:

- Defendants’ vendor, IDM, is processing over 700 gigabytes of e-mail and related data;
- Defendants’ counsel has begun the review of the e-mails and attachments containing the agreed upon search terms;
- As previously indicated, Defendants should be able to begin producing responsive documents on a rolling basis by July 2, 2010; and
- Defendants should be able to complete production of responsive documents on or before July 15, 2010.

Based upon the foregoing and the utter lack of any evidence of willful delay, Plaintiffs’ “letter motion” for sanctions should be denied in its entirety.

Respectfully submitted,

MOSES & SINGER LLP


Jennifer Nigro

cc. Chittur & Assocs. (via ECF)
Attorneys for Plaintiffs